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April 24, 2020

BY ECF

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Lucas v. City of New York, et al.,
19 CV 3494 (FB)(RLM)

Your Honor:

I am an attorney in the Special Federal Litigation Division of the New York City Law Department, representing defendants the City of New York, Stephen Lalchan, Adam Georg, Jason Fritz, Robert Bracero, Thomas Reo, Daniel Sjoberg, Keith Shine, and Kevin Catalina (collectively, “Defendants”) in the above-referenced matter. Defendants write in response to the Court’s Order of March 30, 2020, directing the parties to confer and inform the court by today whether they seek to adjourn the settlement conference previously scheduled for May 15, 2020, at 10 a.m. After conferring, the parties request that the settlement conference be adjourned to a date that is amenable to the Court that falls after June 29, 2020.

As set forth in Defendants’ letter dated March 26, 2020 (Docket Entry 41), document production in this matter has been delayed by the COVID-19 pandemic, in addition to a ransomware attack on Epiq Global (“Epiq”), this office’s electronic discovery vendor, and the resulting lengthy inaccessibility of Epiq’s systems, including the document review platform being used by Defendants for review and production in this matter. As a result, the parties agreed that Defendants would endeavor to produce documents, on a rolling basis, by June 24, 2020, a schedule which Your Honor endorsed by Order dated March 30, 2020. Given this schedule, Defendants request, with Plaintiff’s consent, that the settlement conference be postponed until after production of these documents to make the conference more productive.

Defendants thank the Court for its consideration of this request.

Respectfully submitted,

Joanne M. McLaren /s/

Joanne M. McLaren

cc: Gabe Harvis, Esq. (by ECF)
Baree Fett, Esq. (by ECF)